

Message

From: Tonnesen, Gail [Tonnesen.Gail@epa.gov]
Sent: 2/25/2021 5:31:07 PM
To: Beeler, Cindy [Beeler.Cindy@epa.gov]; Daly, Carl [Daly.Carl@epa.gov]; Bean, Clayton [bean.clayton@epa.gov]; Jackson, Scott [Jackson.Scott@epa.gov]; Fallon, Gail [fallon.gail@epa.gov]; Morales, Monica [Morales.Monica@epa.gov]
CC: Smith, Claudia [Smith.Claudia@epa.gov]; Brimmer, Amanda [Brimmer.Amanda@epa.gov]; Patefield, Scott [Patefield.Scott@epa.gov]; Zull, Aaron [zull.aaron@epa.gov]; Matichuk, Rebecca [Matichuk.Rebecca@epa.gov]; Fiedler, Kerri [Fiedler.Kerri@epa.gov]
Subject: RE: Update on Congressman Blake and recent UPA/WEA moderate attainment FIP questions

Carl,

To follow up on Cindy's email, the new UDAQ study tank speciation data was incorporated in to the UBEI2017-Update,

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Thanks,
Gail

From: Beeler, Cindy <Beeler.Cindy@epa.gov>
Sent: Thursday, February 25, 2021 8:28 AM
To: Daly, Carl <Daly.Carl@epa.gov>; Bean, Clayton <bean.clayton@epa.gov>; Jackson, Scott <Jackson.Scott@epa.gov>; Fallon, Gail <fallon.gail@epa.gov>; Morales, Monica <Morales.Monica@epa.gov>
Cc: Smith, Claudia <Smith.Claudia@epa.gov>; Brimmer, Amanda <Brimmer.Amanda@epa.gov>; Tonnesen, Gail <Tonnesen.Gail@epa.gov>; Patefield, Scott <Patefield.Scott@epa.gov>; Zull, Aaron <zull.aaron@epa.gov>
Subject: RE: Update on Congressman Blake and recent UPA/WEA moderate attainment FIP questions

We are working with UDAQ right now on a rebuttal to UPA's Review of the "the VOC study" which is the study you link below, aka the Uinta Basin Composition Study (UBCS). The study's main goal was to better characterize the speciation of the various emission sources – tanks, fugitives, pneumatic controllers/pumps, etc. to improve photochemical model performance. The UBCS was published 3/31/20 and we received their Review on 2/5/21, coincidentally as enforcement cases on oil tank emissions proceed.

In their Review, UPA focused on the oil tank emissions with issues on the representativeness and acceptance criteria of pressurized liquid samples, characterization of the heavier portion of the liquid samples in the equation of state model (EOS/PSM), sample sites with unusual operating conditions, and use of mean instead of median in estimating an oil tank emission factor.

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Let me know if you've questions,

Cindy Beeler

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From: Daly, Carl <Daly.Carl@epa.gov>
Sent: Wednesday, February 24, 2021 5:13 PM
To: Bean, Clayton <bean.clayton@epa.gov>; Jackson, Scott <Jackson.Scott@epa.gov>; Fallon, Gail <fallon.gail@epa.gov>; Morales, Monica <Morales.Monica@epa.gov>
Cc: Smith, Claudia <Smith.Claudia@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Brimmer, Amanda <Brimmer.Amanda@epa.gov>; Tonnesen, Gail <Tonnesen.Gail@epa.gov>; Patefield, Scott <Patefield.Scott@epa.gov>
Subject: RE: Update on Congressman Blake and recent UPA/WEA moderate attainment FIP questions

Thanks for the update Clayton.

On a related issue the Ute BC recently sent a letter to the acting Administrator (attached).

The letter makes this statement:

The Tribe has also heard concerns from its industry partners regarding a study titled "UDAQ Volatile Organic Compound Emissions from Oil and Gas Wells in the Uinta Basin." We understand that an independent analysis of this study showed serious flaws in the data collection, sampling, and analysis.

I assume the reference is to this report that UDAQ has on their web site: [Composition of Volatile Organic Compound Emissions From Oil and Gas Wells in the Uinta Basin.](#)

What if any status do we have on using that report to support the FIP or O3 modeling?

Thanks

Carl Daly
303-312-6416

From: Bean, Clayton <bean.clayton@epa.gov>
Sent: Wednesday, February 24, 2021 5:01 PM
To: Jackson, Scott <Jackson.Scott@epa.gov>; Fallon, Gail <fallon.gail@epa.gov>; Morales, Monica <Morales.Monica@epa.gov>; Daly, Carl <Daly.Carl@epa.gov>
Cc: Smith, Claudia <Smith.Claudia@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Brimmer, Amanda <Brimmer.Amanda@epa.gov>
Subject: Update on Congressman Blake and recent UPA/WEA moderate attainment FIP questions

Hi Everyone,

Last week's Uinta Basin Ozone Workgroup meeting had Utah Congressman Blake in attendance. Some high-level presentations were given for his benefit that explained the issues in the basin and possible future regulatory action. He noted that his takeaway is that industry is already "doing everything they can" and being proactive in the Basin, yet the unpredictable snow cover is causing violation of the NAAQS outside of industry control – which, in my opinion, didn't fully match with the information given in the presentations.

In asking the workgroup what he can do for them, UPA/WEA responded to the Congressman that, 1. EPA political appointees need to be placed and briefed ASAP so that , 2. EPA rulemaking actions that facilitate continued development can progress with haste (i.e. the ERC banking rule and U&O FIP). They also noted that he be aware that if the ozone standard is lowered any further, it would approach background levels to which there is very little that could be done to attain the standard.

There were also points directed to moderate attainment FIP requirements, specifically, uncertainty with how RFP (actually ROP) will be applied to the NAA (e.g. will it be applied as a blanket 15% VOC reduction across the entire NAA, or will it be applied as 15% VOC reductions on state jurisdiction and 15% VOC reductions on tribal lands). FYI, UPA brought this question to DAQ which led me to ask the EPA national ozone workgroup.

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Additionally, today Mike N. (Ute Tribe) received a call from Rikki Hrenko-Browning (UPA) asking probing questions about EPA's intentions for the moderate attainment FIP (i.e. timelines, where we are in the process, how the FIP will coincide with the state's SIP, and other generalities). She said that UPA will be contacting EPA to get answers to these types of questions. Note: Within the last month Rikki also had a call with DAQ and posed these same questions among others... Lastly, Mike noted that she will be inviting EPA to present on the potential moderate attainment FIP at UPA's "Lunch and Learn" webinar series on May 25th (we EPA R8/OAQPS recently attended a 179B specific webinar that UPA, BREATHE Utah, and DAQ presented)

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Let me know if you have any questions.

Clayton Bean

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